

# **EXHIBIT G**

1 Scott R. Mosko (State Bar No. 106070)  
2 scott.mosko@finnegan.com  
2 FINNEGAN, HENDERSON, FARABOW,  
3 GARRETT & DUNNER, L.L.P.  
3 Stanford Research Park  
3 3300 Hillview Avenue  
4 Palo Alto, California 94304  
5 Telephone: (650) 849-6600  
5 Facsimile: (650) 849-6666

6 Attorneys for Defendant  
7 Winston Williams

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9  
10 UNITED STATES DISTRICT COURT  
11  
12 NORTHERN DISTRICT OF CALIFORNIA  
13  
14 SAN JOSE DIVISION

15 FACEBOOK, INC. and MARK ZUCKERBERG,

16 CASE NO. C 07-01389 RS

17 Plaintiffs,

18 v.  
19 DEFENDANT WINSTON  
20 WILLIAMS'S RESPONSES TO  
21 PLAINTIFF FACEBOOK INC.'S  
22 FIRST SET OF REQUESTS FOR  
23 PRODUCTION OF DOCUMENTS  
24 (Nos. 1-99)

25 CONNECTU LLC, (now known as CONNECTU,  
26 INC.), CAMERON WINKLEVOSS, TYLER  
27 WINKLEVOSS, DIVYA NARENDRA,  
28 PACIFIC NORTHWEST SOFTWARE, INC.,  
WINSTON WILLIAMS, WAYNE CHANG,  
DAVID GUCWA and DOES 1-25,

Defendants.

21 PROPOUNDING PARTY: Plaintiff FACEBOOK, INC.

22 RESPONDING PARTY: Defendant WINSTON WILLIAMS

23 SET NO.: ONE (1) - NOS. 1-99

1                   TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

2                   The above-named party hereby serves its responses, pursuant to Federal Rules of Civil  
3 Procedure 34, to the requests for production of documents as follows:

4                   **GENERAL OBJECTIONS**

5                   1.         Responding party objects to each Request as well as all definitions and instructions to  
6 the extent they seek to impose obligations that are broader than or inconsistent with the California  
7 Rules of Civil Procedure and applicable Local Rules or court orders.

8                   2.         Responding party objects to each Request, as well as all definitions and instructions  
9 to the extent they seek the disclosure of information protected by the attorney-client privilege,  
10 attorney work-product doctrine, or any other applicable privilege or protection, as provided by any  
11 applicable law. Responding party does not intend to produce such privileged or protected  
12 documents or information, and the inadvertent disclosure of such is not to be deemed a waiver of any  
13 privilege. Responding party expressly reserves the right to object to the introduction at trial or any  
14 other use of such information that may be inadvertently disclosed. In addition, Responding party  
15 objects to the Requests and all other definitions and instructions to the extent they seek and/or  
16 require Responding party to produce a privilege log for documents or information falling within the  
17 attorney-client privilege or work-product doctrine, if such documents or information were created  
18 after the date that this lawsuit was filed.

19                  3.         Responding party objects to each Request and all definitions and instructions to the  
20 extent they are vague, overly broad, unduly burdensome, exceed the boundaries of discoverable  
21 information, or fail to describe the document sought with the required reasonable particularity.

22                  4.         Responding party objects to each Request and all definitions and instructions to the  
23 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs  
24 of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in  
25 the litigation, and the importance of the proposed discovery in resolving the issues.

26                  5.         Responding party objects to each Request and all definitions and instructions to the  
27 extent they seek information that is confidential financial, proprietary, trade secret or other  
28 confidential or competitively sensitive business information relating to Responding party or any

RESPONSES OF DEFENDANT WINSTON WILLIAMS TO

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1 third party. Responding party reserves the right to object that certain information is so confidential  
2 and sensitive that it will not be produced even pursuant to a protective order.

3 6. Responding party objects to each Request and all definitions and instructions to the  
4 extent they seek information not in the custody or control of any other persons or non-parties that are  
5 not in the possession, custody or control of Responding party.

6 7. Responding party objects to the Request and all definitions and instructions to the  
7 extent they seek information that is beyond the scope of this litigation, is not relevant, or that falls  
8 outside the parameters of discoverable information under the California Code of Civil Procedure.

9 8. Responding party has not yet completed its investigation, collection of information,  
10 discovery, and analysis relating to this action. The following response is based on information  
11 known and available to the Responding party at this time. Responding party reserves the right to  
12 modify, change, or supplement its response and to produce additional evidence at trial.

13 9. Responding party's agreement to furnish information in response to Plaintiff's  
14 Requests shall not be deemed as an admission regarding the relevance of the requested information,  
15 nor is it intended to waive any right to object the admissibility of such at trial.

16 **OBJECTIONS TO DEFINITIONS**

17 1. Responding party objects to all definitions to the extent they impose burdens on  
18 responding different or greater than those provided in the Federal Rules of Civil Procedure.

19 2. Responding party objects to all definitions to the extent that they are burdensome,  
20 oppressive and unnecessary.

21 3. Responding party objects to the definition of "ConnectU" as overly oppressive,  
22 burdensome, and effectively creating a subpart, compound and/or complex request.

23 4. Responding party objects to the definition of "Facebook" as vague, uncertain,  
24 overbroad and unintelligible. When the word Facebook is used in a request, Responding party shall  
25 assume it means only the entity identified in the complaint.

26 5. Responding party objects to the definition "YOU" as vague, uncertain, overbroad and  
27 unintelligible. When the word "YOU" in a request, Responding party shall assume it means only the  
28 entity identified in the complaint.

6. Responding party objects to the definition “DOCUMENT”
  7. Responding party objects to the definition “COMMUNICATION”
  8. Responding party objects to the definition “COMPUTER CODE”
  9. Responding party objects to the definition “LAWSUITS”

## **OBJECTIONS TO INSTRUCTIONS**

- 10        1.     Responding party objects to Instruction Nos. A., B., and C. as beyond the scope of the  
11 Federal Rules of Civil Procedure.

12        2.     Responding party objects to Instruction No. \_\_\_, as oppressive and will only produce  
13 documents, to the extent they are relevant and otherwise not privileged that are in Responding  
14 party's personal possession.

15        3.     Responding party objects to Instruction No. \_\_\_\_ as oppressive and burdensome and  
16 will not provide a log as requested.

## **RESPONSES AND SPECIFIC OBJECTIONS**

**REQUEST NO. 1:**

All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO FACEBOOK

## **RESPONSE TO REQUEST NO. 1:**

Responding party incorporates the general objections and the objections to definitions into this response. In addition, Responding party objects to the Request as vague and overbroad. The phrase “related to Facebook,” is uncertain and is so obtuse that it could mean any paper or file that has the word “facebook” on it. As such, to perform a search so broad would require an undue amount of time and expense.

**REQUEST NO. 2:**

All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO CONNECTICUT

1     **RESPONSE TO REQUEST NO. 2:**

2                 Responding party incorporates the general objections and the objections to definitions into  
3     this response. In addition, Responding party objects to the Request as vague and overbroad. The  
4     phrase “related to ConnectU,” is uncertain and is so obtuse that it could mean any paper or file that  
5     has the word “ConnectU” on it. As such, to perform a search so broad would require an undue  
6     amount of time and expense.

7     **REQUEST NO. 3:**

8                 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Pacific  
9     Northwest Software, pickatime.com, John Taves, Joel Voss, Mike Hayner, Alex Novikov, Alex  
10    Shkurop, “PICKATIME\mrprimate,” “PICKATIME\mhayner,” “PICKATIME\jvoss,”  
11    “PICKATIME\jt,” and/or “PICKATIME\ashkuropat.”

12    **RESPONSE TO REQUEST NO. 3:**

13                 Responding party incorporates the general objections and the objections to definitions into  
14     this response. The phrase “RELATED TO Pacific Northwest Software, pickatime.com, John Taves,  
15     Joel Voss, Mike Hayner, Alex Novikov, Alex Shkurop, “PICKATIME\mrprimate,”  
16    “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,” and/or  
17    “PICKATIME\ashkuropat” is overbroad in that it calls for documents and communications that are  
18     irrelevant to the allegations in the Second Amended Complaint and not calculated to lead to the  
19     discovery of admissible evidence. As such, to perform a search so broad would require an undue  
20     amount of time and expense. This request calls for confidential information.

21    **REQUEST NO. 4:**

22                 All versions of COMPUTER CODE YOU wrote, programmed or helped develop for use by  
23     CONNECTU, Cameron Winklevoss, Tyler Winklevoss, or Divya Narendra between February 4,  
24     2003 and the present.

25    **RESPONSE TO REQUEST NO. 4:**

26                 Responding party incorporates the general objections and the objections to definitions into  
27     this response. In addition, Responding party objects to this Request as overbroad and vague, and  
28     calling for proprietary information. This Request, as phrased calls for the production of all code,

1 regardless of whether it is relevant to the allegations against Responding party in the Second  
2 Amended Complaint. Moreover, Responding party objects to this Request as duplicative to the  
3 extent that Requesting party already has relevant code in its possessions. This Request is overly  
4 burdensome, and literal compliance with it would be prohibitively expensive.

5 **REQUEST NO. 5:**

6 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Wayne Chang.

7 **RESPONSE TO REQUEST NO. 5:**

8 Responding party incorporates the general objections and the objections to definitions into  
9 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
10 phrase “related to Wayne Chang,” is uncertain and is so obtuse that it could mean any paper or file  
11 that has the words “Wayne Chang” on it. As such, to perform a search so broad would require an  
12 undue amount of time and expense.

13 **REQUEST NO. 6:**

14 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO David Gucwa.

15 **RESPONSE TO REQUEST NO. 6:**

16 Responding party incorporates the general objections and the objections to definitions into  
17 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
18 phrase “related to David Gucwa,” is uncertain and is so obtuse that it could mean any paper or file  
19 that has the words “David Gucwa” on it. As such, to perform a search so broad would require an  
20 undue amount of time and expense.

21 **REQUEST NO. 7:**

22 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Cameron  
23 Winklevoss.

24 **RESPONSE TO REQUEST NO. 7:**

25 Responding party incorporates the general objections and the objections to definitions into  
26 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
27 phrase “related to Cameron Winklevoss,” is uncertain and is so obtuse that it could mean any paper  
28

1 or file that has the words "Cameron Winklevoss" on it. As such, to perform a search so broad would  
2 require an undue amount of time and expense.

3 **REQUEST NO. 8:**

4 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Tyler  
5 Winklevoss.

6 **RESPONSE TO REQUEST NO. 8:**

7 Responding party incorporates the general objections and the objections to definitions into  
8 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
9 phrase "related to Tyler Winklevoss," is uncertain and is so obtuse that it could mean any paper or  
10 file that has the words "Tyler Winklevoss" on it. As such, to perform a search so broad would  
11 require an undue amount of time and expense.

12 **REQUEST NO. 9:**

13 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO Divya Narendra.

14 **RESPONSE TO REQUEST NO. 9:**

15 Responding party incorporates the general objections and the objections to definitions into  
16 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
17 phrase "related to Divya Narendra," is uncertain and is so obtuse that it could mean any paper or file  
18 that has the words "Divya Narendra" on it. As such, to perform a search so broad would require an  
19 undue amount of time and expense. Responding party will perform a reasonable search given the  
20 allegations in the Second Amended Complaint and, to the extent responsive non-privileged  
21 documents exist that concern the specific allegations made against Responding party, said  
22 documents and files will be produced subject to these objections.

23 **REQUEST NO. 10:**

24 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO the software  
25 program called "Social Butterfly."

26 **RESPONSE TO REQUEST NO. 10:**

27 Responding party incorporates the general objections and the objections to definitions into  
28 this response. In addition, Responding party objects to the Request as vague and overbroad. The

1 phrase "related to Social Butterfly," is uncertain and is so obtuse that it could mean any paper or file  
2 that has the words "Social Butterfly" on it. As such, to perform a search so broad would require an  
3 undue amount of time and expense. Moreover the phrase "software program related to Social  
4 Butterfly" is vague and uncertain as different people have referred to "Social Butterfly" as different  
5 things.

6 **REQUEST NO. 11:**

7 All DOCUMENTS or COMMUNICATIONS concerning or RELATED TO the software  
8 program called "Importer."

9 **RESPONSE TO REQUEST NO. 11:**

10 Responding party incorporates the general objections and the objections to definitions into  
11 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
12 phrase "related to Importer," is uncertain and is so obtuse that it could mean any paper or file that  
13 has the word "Importer" on it. As such, to perform a search so broad would require an undue  
14 amount of time and expense.

15 **REQUEST NO. 12:**

16 All DOCUMENTS concerning or RELATED TO iMarc LLC, Marc Pierrat, Nils Menton,  
17 Dave Tufts, Fred LeBlanc, and/or Nick Grant.

18 **RESPONSE TO REQUEST NO. 12:**

19 Responding party incorporates the general objections and the objections to definitions into  
20 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
21 phrase "related to iMarc LLC, Marc Pierrat, Nils Menton, Dave Tufts, Fred LeBlanc and/or Nick  
22 Grant," is uncertain and is so obtuse that it could mean any paper or file that has the words "iMarc  
23 LLC, Marc Pierrat, Nils Menton, Dave Tufts, Fred LeBlanc and/or Nick Grant" on it. As such, to  
24 perform a search so broad would require an undue amount of time and expense.

25 **REQUEST NO. 13:**

26 All DOCUMENTS concerning or RELATED TO Mark Zuckerberg.

27 **RESPONSE TO REQUEST NO. 13:**

28

1     **REQUEST NO. 34:**

2                 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,  
3     Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler  
4     Winklevoss, Divya Narendra, Wayne Chang, Mike Hayner, John Taves, Joel Voss and/or David  
5     Gucwa regarding FACEBOOK, its server(s), or FACEBOOK'S website(s).

6     **RESPONSE TO REQUEST NO. 34:**

7                 Responding party incorporates the general objections and the objections to definitions into  
8     this response. The phrase “regarding FACEBOOK, its server(s), or FACEBOOK'S website(s)” is  
9     uncertain and is so obtuse that it could mean any paper or file that has the word “facebook” on it. As  
10    such, to perform a search so broad would require an undue amount of time and expense. In addition,  
11    Responding party objects to this Request as overbroad in that it is not limited to the allegations  
12    contained in the Second Amended Complaint. The search for and production of such documents and  
13    files would be overly burdensome and prohibitively expensive.

14    **REQUEST NO. 35:**

15                 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,  
16     Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler  
17     Winklevoss, Divya Narendra, Wayne Chang, Joel Voss, Mike Hayner, John Taves, and/or David  
18     Gucwa regarding CONNECTU or its website(s).

19    **RESPONSE TO REQUEST NO. 35:**

20                 Responding party incorporates the general objections and the objections to definitions into  
21     this response. The phrase “regarding ConnectU or its website is uncertain and is so obtuse that it  
22     could mean any paper or file that has the word “ConnectU” on it. As such, to perform a search so  
23     broad would require an undue amount of time and expense. In addition, Responding party objects to  
24     this Request as overbroad in that it is not limited to the allegations contained in the Second Amended  
25     Complaint. The search for and production of such documents and files would be overly burdensome  
26     and prohibitively expensive.

1     **REQUEST NO. 36:**

2                 All COMMUNICATIONS between YOU and CONNECTU, Pacific Northwest Software,  
3     Howard Winklevoss, Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler  
4     Winklevoss, Divya Narendra, Wayne Chang, Joel Voss, Mike Hayner, John Taves, and/or David  
5     Gucwa regarding Mark Zuckerberg or the work he performed for HARVARDCONNECTION,  
6     CONNECTU, Cameron Winklevoss, Tyler Winklevoss, and/or Divya Narendra.

7     **RESPONSE TO REQUEST NO. 36:**

8                 Responding party incorporates the general objections and the objections to definitions into  
9     this response. The phrase “regarding Mark Zuckerberg” is uncertain and is so obtuse that it could  
10   mean any paper or file that has the words “Mark Zuckerberg” on it. In addition, Responding party  
11   objects to this Request as overbroad in that it is not limited to the allegations contained in the Second  
12   Amended Complaint. The search for and production of such documents and files would be overly  
13   burdensome and prohibitively expensive.

14    **REQUEST NO. 37:**

15                 All COMMUNICATIONS between YOU and CONNECTU, Howard Winklevoss,  
16     Winklevoss Consultants, Winklevoss, Inc., Cameron Winklevoss, Tyler Winklevoss, Divya  
17     Narendra, Wayne Chang, David Gucwa, and/or Joel Voss regarding HARVARDCONNECTION or  
18     the harvardconnection.com website.

19    **RESPONSE TO REQUEST NO. 37:**

20                 Responding party incorporates the general objections and the objections to definitions into  
21     this response. The phrase “regarding HarvardConnection” is uncertain and is so obtuse that it could  
22   mean any paper or file that has the words “HarvardConnection” on it. In addition, Responding party  
23   objects to this Request as overbroad in that it is not limited to the allegations contained in the Second  
24   Amended Complaint. The search for and production of such documents and files would be overly  
25   burdensome and prohibitively expensive.

26    **REQUEST NO. 38:**

27                 All COMMUNICATIONS between YOU and Pacific Northwest Software, or any of the  
28     employees and consultants to Pacific Northwest Software, including Wayne Chang, John Taves, Joel

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1 Voss, Mike Hayner, Alex Novikov, Alex Shkuropat, "PICKATIME/mrprimate,"  
2 "PICKATIME/mhayner," "PICKATIME/jvoss," "PICKATIME/jt" and/or  
3 "PICKATIME/ashkuropat," or anyone with an email address styled as  
4 "\_\_\_\_\_@pnwsoft.com" or "\_\_\_\_\_@pickatime.com," regarding CONNECTU and/or its  
5 website(s).

6 **RESPONSE TO REQUEST NO. 38:**

7 Responding party incorporates the general objections and the objections to definitions into  
8 this response. The phrase "regarding ConnectU" is uncertain and is so obtuse that it could mean any  
9 paper or file that has the word "ConnectU" on it. In addition, Responding party objects to this  
10 Request as overbroad in that it is not limited to the allegations contained in the Second Amended  
11 Complaint. The search for and production of such documents and files would be overly burdensome  
12 and prohibitively expensive.

13 **REQUEST NO. 39:**

14 All COMMUNICATIONS between YOU and iMarc or any of its employees, including Marc  
15 Pierrat, Nils Menton, Dave Tufts, Fred LeBlanc, Nick Grant, or anyone with an email address styled  
16 as "\_\_\_\_\_@imarc.net."

17 **RESPONSE TO REQUEST NO. 39:**

18 Responding party incorporates the general objections and the objections to definitions into  
19 this response. In addition, Responding party objects to this Request as overbroad in that it is not  
20 limited to the allegations contained in the Second Amended Complaint. The Request further calls  
21 for proprietary information. The search for and production of such documents and files would be  
22 overly burdensome and prohibitively expensive.

23 **REQUEST NO. 40:**

24 All COMMUNICATIONS regarding any work YOU performed for CONNECTU, Pacific  
25 Northwest Software, pickatime.com, Howard Winklevoss, Winklevoss consultants, Winklevoss Inc.,  
26 Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Wayne Chang, David Gucwa, i2hub,  
27 and/or Joel Voss, including any development work YOU performed on computer programs variously  
28

1 titled “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,”  
2 “grabFacebook2.php,” “social network spider” or “crawler.”

3 **RESPONSE TO REQUEST NO. 40:**

4 Responding party incorporates the general objections and the objections to definitions into  
5 this response. The phrase “regarding any work YOU performed for CONNECTU, pickatime.com,  
6 Howard Winklevoss, Winklevoss Consultants, Winklevoss Inc., Cameron Winklevoss, Tyler  
7 Winklevoss, Divya Narendra, Wayne Chang, David Gucwa, i2hub, and/or Joel Voss” is so obtuse  
8 that it could require the search for and production of any document or file that has such words on it.  
9 As such it calls for documents and information that are irrelevant and not likely to lead to the  
10 discovery of admissible evidence. In addition, Responding party objects to this Request as  
11 overbroad in that it is not limited to the allegations contained in the Second Amended Complaint.  
12 The search for and production of such documents and files would be overly burdensome and  
13 prohibitively expensive.

14 **REQUEST NO. 41:**

15 A copy of all versions of COMPUTER CODE (including, without limitation, source code,  
16 object code and scripts) YOU wrote for, or for which YOU were paid by, i2Hub, Pacific Northwest  
17 Software, pickatime.com, CONNECTU, Howard Winklevoss, Winklevoss Consultants, Winklevoss,  
18 Inc., Maria Antonelli, RowAmerica LLC, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra,  
19 Wayne Chang, David Gucwa, i2hub, and/or Joel Voss that was designed to extract information from  
20 any website, including the facebook.com or facebook.com, friendster.com, myspace.com, and/or  
21 hi5.com.

22 **RESPONSE TO REQUEST NO. 41:**

23 Responding party incorporates the general objections and the objections to definitions into  
24 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
25 calling for proprietary information. This Request, as phrased calls for the production of all code,  
26 regardless of whether it is relevant to the allegations against Responding party in the Second  
27 Amended Complaint. This Request, as phrased calls for the production of code having nothing to do  
28 with the allegations in the Second Amended Complaint, and therefore is overly broad. Responding

1 party objects to this Request to the extent Responding party already has relevant code in its  
2 possession.

3 **REQUEST NO. 42:**

4 A copy, including an executable copy, of all versions of COMPUTER CODE RELATED TO  
5 the script, attached hereto, contained at PNS002119.

6 **RESPONSE TO REQUEST NO. 42:**

7 Responding party incorporates the general objections and the objections to definitions into  
8 this response. In addition, Responding party objects to this Request as overly burdensome to the  
9 extent that this Request calls for Executable code. Responding party further objects to the extent  
10 that this Request, as phrased calls production of code already in Requesting party's possession. As a  
11 result, the production of such code would be overly burdensome, and prohibitively expensive.

12 **REQUEST NO. 43:**

13 All documents related to any account YOU created to access any Facebook website,  
14 including thefacebook.com and facebook.com.

15 **RESPONSE TO REQUEST NO. 43:**

16 Responding party incorporates the general objections and the objections to definitions into  
17 this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
18 limited to the allegations contained in the Second Amended Complaint. The search for and  
19 production of such documents and files would be overly burdensome and prohibitively expensive.

20 **REQUEST NO. 44:**

21 All COMMUNICATIONS RELATED TO the script, attached hereto, contained at  
22 PNS0002119, including all COMMUNICATIONS concerning the reasons for developing the script,  
23 and any results obtained from running such script.

24 **RESPONSE TO REQUEST NO. 44:**

25 Responding party incorporates the general objections and the objections to definitions into  
26 this response. Responding party objects to the phrase "any results obtained from running such  
27 script" as vague and unintelligible. The search for and production of such documents and files  
28 would be overly burdensome and prohibitively expensive.

1     **REQUEST NO. 45:**

2                 All documents related to each of the affirmative defenses YOU assert in YOUR answer to  
3     the Second Amended Complaint.

4     **RESPONSE TO REQUEST NO. 45:**

5                 Responding party incorporates the general objections and the objections to definitions into  
6     this response. This Request is overly broad.

7     **REQUEST NO. 46:**

8                 All COMMUNICATIONS concerning or RELATED TO CONNECTU, FACEBOOK, or  
9     Mark Zuckerberg with any purported programmer or author of source code for programs hosted by  
10   CONNECTU, Harvard Connection and/or [www.connectu.com](http://www.connectu.com), including (but not limited to) all  
11   COMMUNICATIONS with Pacific Northwest Software, Victor Gao, Sanjay Mavinkurve, Joseph  
12   Jackson, Wayne Chang, David Gucwa, iMarc LLC, Marc Pierrat, Nils Menton, Dave Tufts, Fred  
13   LeBlanc, Nick Grant, John Taves, Joel Voss, Mike Hayner, Alex Novikov, Alex Shkuropat,  
14   “PICKATIME\mrpimate,” “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,”  
15   and/or “PICKATIME\ashkuropat.”

16     **RESPONSE TO REQUEST NO. 46:**

17                 Responding party incorporates the general objections and the objections to definitions into  
18     this response. In addition, Responding party objects to the Request as vague and overbroad. The  
19     phrase “all COMMUNICATIONS with Winston Williams, Victor Gao, Sanjay Mavinkurve, Joseph  
20   Jackson, Wayne Chang, David Gucwa, iMarc LLC, Marc Pierrat, Nils Menton, Dave Tufts, Fred  
21   LeBlanc, Nick Grant, John Taves, Joel Voss, Mike Hayner, Alex Novikov, Alex Shkuropat,  
22   “PICKATIME\mrpimate,” “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,”  
23   and/or “PICKATIME\ashkuropat.”” is uncertain and is so obtuse that it could mean any paper or file  
24   that has any of the words in this phrase on it. Similarly, the phrase “RELATED TO CONNECTU,  
25   FACEBOOK, or Mark Zuckerberg with any purported programmer or author of source code for  
26   programs hosted by CONNECTU, Harvard Connection and/or [www.connectu.com](http://www.connectu.com)” is equally vague  
27   and obtuse. This Request as phrased also calls for the production of confidential information that is

1 irrelevant and not calculated to lead to the discovery of admissible evidence. To perform a search so  
2 broad would require an undue amount of time and expense.

3 **REQUEST NO. 47:**

4 All COMMUNICATIONS concerning any work designed to integrate the program know as  
5 "i2hub" with CONNECTU.

6 **RESPONSE TO REQUEST NO. 47:**

7 Responding party incorporates the general objections and the objections to definitions into  
8 this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
9 limited to the allegations contained in the Second Amended Complaint. The Request further calls  
10 for proprietary information. The search for and production of such documents and files would be  
11 overly burdensome and prohibitively expensive. This Request calls for the production of documents  
12 that are irrelevant and not calculated to lead to the discovery of admissible evidence.

13 **REQUEST NO. 48:**

14 All COMMUNICATIONS in Instant messaging format concerning CONNECTU, Cameron  
15 Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Winston Williams, David  
16 Gucwa, Winklevoss Consultants, RowAmerica LLC, and/or Maria Antonelli.

17 **RESPONSE TO REQUEST NO. 48:**

18 Responding party incorporates the general objections and the objections to definitions into  
19 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
20 phrase "concerning CONNECTU, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra,  
21 Howard Winklevoss, Winston Williams, David Gucwa, Winklevoss Consultants, RowAmerica LLC,  
22 and/or Maria Antonelli" is so broad and vague that this Request, as phrased calls for any documents  
23 with these words regardless of whether such documents concern the allegations of the Second  
24 Amended Complaint. This Request further calls for proprietary information wholly irrelevant and  
25 not calculated to lead to the discovery of admissible evidence. To perform a search so broad would  
26 require an undue amount of time and expense.

1      **REQUEST NO. 49:**

2            All COMMUNICATIONS using Instant Messaging format, including (but not limited to) all  
3            COMMUNICATIONS using the AOL Instant Messenger (“AIM”) “user name “rrmrprim8,”  
4            concerning CONNECTU, PACIFIC NORTHWEST SOFTWARE, Cameron Winklevoss, Tyler  
5            Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Gucwa, Winklevoss  
6            Consultants, RowAmerica LLC, i2hub, and/or Maria Antonelli.

7      **RESPONSE TO REQUEST NO. 49:**

8            Responding party incorporates the general objections and the objections to definitions into  
9            this response. In addition, Responding party objects to the Request as vague and overbroad. The  
10          phrase “using the AOL Instant Messenger (“AIM”) “user name “jpickatime,” concerning  
11          CONNECTU, PACIFIC NORTHWEST SOFTWARE, Winston Williams, Cameron Winklevoss,  
12          Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Gucwa, Winklevoss  
13          Consultants, RowAmerica LLC, i2hub, and/or Maria Antonelli” is so broad and vague that this  
14          Request, as phrased calls for any documents with these words regardless of whether such documents  
15          concern the allegations of the Second Amended Complaint. This Request further calls for  
16          proprietary information wholly irrelevant and not calculated to lead to the discovery of admissible  
17          evidence. To perform a search so broad would require an undue amount of time and expense.

18      **REQUEST NO. 50:**

19            All COMMUNICATIONS in Instant Messaging format, including (but not limited to) all  
20            COMMUNICATIONS using the AOL Instant Messenger (“AIM”) “user name “rrmrprim8,”  
21            concerning FACEBOOK, Mark Zuckerberg, Christopher Hughes, Dustin Moskovitz, Eduardo  
22            Saverin, and/or Andrew McCollum.

23      **RESPONSE TO REQUEST NO. 50:**

24            Responding party incorporates the general objections and the objections to definitions into  
25            this response. In addition, Responding party objects to the Request as vague and overbroad. The  
26          phrase “all COMMUNICATIONS using the AOL Instant Messenger (“AIM”) “user name  
27          “jpickatime,” concerning FACEBOOK, Mark Zuckerberg, Christopher Hughes, Dustin Moskovitz,  
28          Eduardo Saverin, and/or Andrew McCollum” is so broad and vague that this Request, as phrased

1 calls for any documents with these words regardless of whether such documents concern the  
2 allegations of the Second Amended Complaint. This Request further calls for proprietary  
3 information wholly irrelevant and not calculated to lead to the discovery of admissible evidence. To  
4 perform a search so broad would require an undue amount of time and expense.

5 **REQUEST NO. 51:**

6 All COMMUNICATIONS with i2hub or Ruth Ann Degutis concerning FACEBOOK and/or  
7 CONNECTU.

8 **RESPONSE TO REQUEST NO. 51:**

9 Responding party incorporates the general objections and the objections to definitions into  
10 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
11 phrase "concerning Facebook and/or ConnectU" is so broad and vague that this Request, as phrased  
12 calls for any documents with these words regardless of whether such documents concern the  
13 allegations of the Second Amended Complaint. This Request further calls for proprietary  
14 information wholly irrelevant and not calculated to lead to the discovery of admissible evidence. To  
15 perform a search so broad would require an undue amount of time and expense.

16 **REQUEST NO. 52:**

17 All COMMUNICATIONS and DOCUMENTS the that refer to the source (i.e., the name of  
18 the person who provided the information to YOU) and identity (i.e., the name of the person who  
19 created the log-in name and password provided to YOU) for all log-ins and passwords YOU,  
20 CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub or anyone on YOUR behalf  
21 used to access the FACEBOOK website, including (but not limited to) the source and identity for all  
22 of the following logins and/or passwords: (a) zuzana@bu.edu & -password "123;" (b)  
23 sj391@columbia.edu & password "east;" (c) lbowman@wellesley.edu & password "Divya;" (d)  
24 redgutis@student.umass.edu & password "ruth1783;" (e) r16@duke.edu & Password "nacho;" (f)  
25 mjhall@fax.harvard.edu & password "hallmark;" (g) bolger@umich.edu & password "bolger;" (h)  
26 maria.rocha\_oliviera@tufts.edu & password "maria;"(i) Christopher.librandi@yale.edu & password  
27 "christoph;" (j) jm245@cornell.edu & password "fishapple;"(k) yee@bu.edu and password  
28 "ab1036;" (l) barroseu@bc.edu & password "eutychius;" (m) Beelzebub@brown.edu & password

RESPONSES OF DEFENDANT WINSTON WILLIAMS TO

PLAINTIFFS' FIRST REQUEST FOR

PRODUCTION OF DOCUMENTS (NOS. 1-99)

Case No. 5:07 CV 01389 RS

1 "asdfgh;" (n) hogan@alum.mit.edu & password "csfb;" (o) procella@princeton.edu & Password  
2 "angelo;" (p) carlsson@stanford.edu & password "fake\_pwd"; (q) Stinab8@ucla.edu & password  
3 "divya;" (r) sen4@georgetown.edu & Password "sexyrena;" (s)singer.d@neu.edu & password  
4 "1211;" (t) mj405@nyu.edu & password "rajubros;" (u) porcell@princeton.edu & password  
5 "frankmaria;" (v) cmg25@georgetown.edu & password "top59gun;" (w)sk1281@columbia.edu &  
6 Password "khalid1" and (x) jhn2102@columbia.edu & password "onitsuka."

7 **RESPONSE TO REQUEST NO. 52:**

8 Responding party incorporates the general objections and the objections to definitions into  
9 this response. The search for and production of such documents and files would be overly  
10 burdensome and prohibitively expensive.

11 **REQUEST NO. 53:**

12 All COMMUNICATIONS concerning the development of all computer databases (or  
13 specific database schemas, tables, modules, procedures, scripts or sub-routines) that YOU, Pacific  
14 Northwest Software, www.pickatime.com, CONNECTU, iMarc LLC or i2hub developed or in any  
15 way participated or assisted in the development thereof, in any computer language (such as "PHP,"  
16 "html," "SQL" or "Perl"), which computer databases (or specific database schemas, tables, modules,  
17 procedure, scripts or sub-routines) were used to store communications with FACEBOOK users or to  
18 store information downloaded or received from thefacebook.com, facebook.com, or any other  
19 FACEBOOK server. Such computer databases, schemas, tables, modules, procedures, scripts or  
20 sub-routines include, but are not limited to, any computer programs associated with the names  
21 "profile importer," "profile grabber," "importer," "Facebook importer," "crawler,"  
22 "grabFacebook.php," "grabFacebook2.php," "importer.i2hub.com," "import system" and/or "Social  
23 Butterfly."

24 **RESPONSE TO REQUEST NO. 53:**

25 Responding party incorporates the general objections and the objections to definitions into  
26 this response. The search for and production of such documents and files would be overly  
27 burdensome and prohibitively expensive.

1      **REQUEST NO. 54:**

2            All COMMUNICATIONS or DOCUMENTS reflecting any computer database(s) (or  
3 specific database schema(s), table(s), module(s), procedure(s), script(s) or sub-routine(s)) used to  
4 send email to FACEBOOK USERS on behalf of CONNECTU, Pacific Northwest Software,  
5 www.pickatime.com, iMarc LLC, and/or i2hub. Such computer databases, schemas, tables,  
6 modules, procedures, scripts or sub-routines include, but are not limited to, any computer programs  
7 associated with the names "profile importer," "profile grabber," "importer," "Facebook importer,"  
8 "crawler," "grabFacebook.php," "grabFacebook2.php," "importer.i2hub.com," "import system"  
9 and/or "Social Butterfly."

10     **RESPONSE TO REQUEST NO. 54:**

11           Responding party incorporates the general objections and the objections to definitions into  
12 this response. The search for and production of such documents and files would be overly  
13 burdensome and prohibitively expensive.

14     **REQUEST NO. 55:**

15           All COMMUNICATIONS or DOCUMENTS associated with, concerning, reflecting, or  
16 RELATED TO the following uniform resource locators: (a) http://dev.connectu.com/importer; (b)  
17 http://www.connectu.com/importer; (c) http://cu.pnswsoft.com/import; (d) www3.pickatime.com; (e)  
18 cu.pnswsoft.com; (f) ch.pnswsoft.com; (g) www.pnswsoft.com; (h) jtphswoft.com; (i)  
19 db.pickatime.com; (j) hop.pickatime.com; (k) http://www.i2hub.com/dgucwa/face; (l)  
20 www.i2hubdgucwa/face; (m) unix15.dmbhosting.com; (n) webconnectu.com; and/or (o)  
21 wwpnwsoft.com.

22     **RESPONSE TO REQUEST NO. 55:**

23           Responding party incorporates the general objections and the objections to definitions into  
24 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
25 phrase "RELATED TO the following uniform resource locators: (a)  
26 http://dev.connectu.com/importer; (b) http://www.connectu.com/importer; (c)  
27 http://cu.pnswsoft.com/import; (d) www3.pickatime.com; (e) cu.phwsoft.com; (f) ch.phwsoft.com;  
28 (g) www.pnswsoft.com; (h) jtphswoft.com; (i) db.pickatime.com; (j) hop.pickatime.com; (k)

1 http://www.i2hub.com/dgucwa/face; (l) www.i2hubdgucwa/face; (m) unix15.dmbhosting.com; (n)  
2 webconnectu.com; and/or (o) wwwpnwsoft.com" is so broad and vague that this Request, as phrased  
3 calls for any documents with these words regardless of whether such documents concern the  
4 allegations of the Second Amended Complaint. This Request further calls for proprietary  
5 information wholly irrelevant and not calculated to lead to the discovery of admissible evidence. To  
6 perform a search so broad would require an undue amount of time and expense.

7 **REQUEST NO. 56:**

8 All DOCUMENTS sufficient to IDENTIFY electronic communication accounts from which  
9 YOU performed work for PACIFIC NORTHWEST SOFTWARE and/or CONNECTU. "Electronic  
10 communication accounts" means accounts used to facilitate electronic communications, including:  
11 email addresses (e.g., "mrprimate@pick\_a\_time.com," mrprimate@pnsoft.com, etc); instant  
12 messaging accounts offered by sites such as America On-Line, Yahoo! and ConnectU (e.g.,  
13 "rrmrprim8" on AOL Instant Messenger ("AIM"), etc.); registered user account names and  
14 passwords for Internet-based services, bulletin boards, chatrooms, blogs, e-mail, and world-wide-  
15 websites that permit person-to-person electronic communication (e.g. login identifier  
16 lbowman@wellesley.edu and password "Divya" for access to social networks like  
17 www.facebook.com, www.friendster.com, www.hi5.com, www.myspace.com, and  
18 www.connectu.com); and/or computer IP addresses for computers through which electronic  
19 communications were performed on behalf of PACIFIC NORTHWEST SOFTWARE and  
20 CONNECTU (e.g., personal IP address 24.22.165.122, PNS server 207.244.158.164, etc.). YOUR  
21 response should specifically IDENTIFY the relevant screen name, email address, domain name,  
22 login identifier, account name, password, and/or IP address by date of use.

23 **RESPONSE TO REQUEST NO. 56:**

24 Responding party incorporates the general objections and the objections to definitions into  
25 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
26 Request as phrased e.g. "work for ConnectU" calls for information wholly irrelevant and not  
27 calculated to lead to the discovery of admissible evidence. This Request further calls for proprietary  
28

1 information. Further this Request appears to include an interrogatory. To perform a search so broad  
2 would require an undue amount of time and expense.

3 **REQUEST NO. 57:**

4 All COMMUNICATIONS or DOCUMENTS, concerning or RELATED TO the use of any  
5 server, including proxy server, to access FACEBOOK's server(s) or website(s), including (but not  
6 limited to) copies of ALL COMMUNICATIONS concerning or RELATED TO the use of any  
7 computer possessing or assigned the following IP addresses: 24.22.165.112; 24.34.190.94;  
8 69.13.181.29; 192.168.0.35; 199.98.29.103; 128.227.95.113; 207.244.158.164; 207.114.225.164;  
9 207.244.158.165; 207.244.158.34; 216.127.32.54; and/or 216.127.32.228.

10 **RESPONSE TO REQUEST NO. 57:**

11 Responding party incorporates the general objections and the objections to definitions into  
12 this response. In addition, Responding party objects to the Request as vague and overbroad. The  
13 phrase "RELATED TO the use of any computer possessing or assigned the following IP addresses:  
14 24.22.165.112; 24.34.190.94; 69.13.181.29; 192.168.0.35; 199.98.29.103; 128.227.95.113;  
15 207.244.158.164; 207.114.225.164; 207.244.158.165; 207.244.158.34; 216.127.32.54; and/or  
16 216.127.32.228" is so broad and vague that this Request, as phrased calls for any documents in these  
17 IP addresses regardless of whether such documents concern the allegations of the Second Amended  
18 Complaint. This Request further calls for proprietary information wholly irrelevant and not  
19 calculated to lead to the discovery of admissible evidence. To perform a search so broad would  
20 require an undue amount of time and expense.

21 **REQUEST NO. 58:**

22 All COMMUNICATIONS or DOCUMENTS associated with, concerning, or RELATED TO  
23 any database schema or tables maintained for or on behalf of CONNECTU, including (but not  
24 limited to) the database schema or table hosted at any of the following IP addresses and called  
25 "connectu:" 24.22.165.112; 24.34.190.94; 69.13.181.29; 192.168.0.35; 199.98.29.103;  
26 128.227.95.113; 207.244.158.164; 207.114.225.164; 207.244.158.165; 207.244.158.34;  
27 216.127.32.54; and/or 216.127.32.228.

28

1   **RESPONSE TO REQUEST NO. 58:**

2           Responding party incorporates the general objections and the objections to definitions into  
3       this response. In addition, Responding party objects to the Request as vague and overbroad. The  
4       phrase “RELATED TO any database schema or tables maintained for or on behalf of CONNECTU”  
5       is so broad and vague that this Request, as phrased calls for any documents concerning ConnectU  
6       regardless of whether such documents concern the allegations of the Second Amended Complaint.  
7       In addition, Responding party objects to the Request as vague and overbroad. The phrase “  
8       including (but not limited to) the database schema or table hosted at any of the following IP  
9       addresses and called “connectu:” 24.22.165.112; 24.34.190.94; 69.13.181.29; 192.168.0.35;  
10      199.98.29.103; 128.227.95.113; 207.244.158.164; 207.114.225.164; 207.244.158.165;  
11      207.244.158.34; 216.127.32.54; and/or 216.127.32.228” is so broad and vague that this Request, as  
12       phrased calls for any documents in these IP addresses regardless of whether such documents concern  
13       the allegations of the Second Amended Complaint. This Request further calls for proprietary  
14       information wholly irrelevant and not calculated to lead to the discovery of admissible evidence. To  
15       perform a search so broad would require an undue amount of time and expense.

16   **REQUEST NO. 59:**

17           All COMMUNICATIONS or DOCUMENTS concerning or RELATED TO the sending of  
18       emails or solicitations to join CONNECTU to any user of FACEBOOK from computers possessing  
19       or assigned the following IP addresses: 24.22.165.112; 24.34.190.94; 69.13.181.29; 192.168.0.35;  
20      199.98.29.103; 128.227.95.113; 207.244.158.164; 207.114.225.164; 207.244.158.165;  
21      207.244.158.34; 216.127.32.54; and/or 216.127.32.228.

22   **RESPONSE TO REQUEST NO. 59:**

23           Responding party incorporates the general objections and the objections to definitions into  
24       this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
25       limited to the allegations contained in the Second Amended Complaint. The phrase “related to” is  
26       uncertain. The search for and production of such documents and files would be overly burdensome  
27       and prohibitively expensive.

1     **REQUEST NO. 60:**

2                 All COMMUNICATIONS or DOCUMENTS associated with, concerning or RELATED TO  
3     the database and COMPUTER CODE stored in a “Subversion” version control system available at  
4     the following uniform resource locators: <http://db/pickatime.com:900/svn/Connect>,  
5     <http://db.pickatime.com:900/svn/connect/ConnectU>, and/or <http://cu.pnwsoft.com>.

6     **RESPONSE TO REQUEST NO. 60:**

7                 Responding party incorporates the general objections and the objections to definitions into  
8     this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
9     limited to the allegations contained in the Second Amended Complaint. The Request further calls  
10    for proprietary information. The search for and production of such documents and files would be  
11    overly burdensome and prohibitively expensive.

12    **REQUEST NO. 60 [sic]:**

13                 All COMMUNICATIONS or DOCUMENTS associated with development of any  
14    COMPUTER CODE associated with, concerning, or RELATED to CONNECTU and/or  
15    FACEBOOK, in which the author is identified by the name “PICKATIME\mrprimate,”  
16    “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,” and/or  
17    “PICKATIME\ashkuropat.”

18     **RESPONSE TO REQUEST NO. 60:**

19                 Responding party incorporates the general objections and the objections to definitions into  
20     this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
21     limited to the allegations contained in the Second Amended Complaint. The phrase “associated with  
22     development of any COMPUTER CODE associated with, concerning or RELATED to  
23     CONNECTU, and/or FACEBOOK, in which the author is identified by the name of  
24     “PICKATIME\mrprimate,” “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,”  
25     and/or “PICKATIME\ashkuropat” is obtuse in that it concerns files or documents irrelevant to the  
26     allegations in the Second Amended Complaint and not likely to lead to the discovery of admissible  
27     evidence. The Request further calls for proprietary information. The search for and production of  
28     such documents and files would be overly burdensome and prohibitively expensive.

1      **REQUEST NO. 61:**

2      All COMMUNICATIONS or DOCUMENTS available in the mysql database “i2hub.com”  
3      associated with, concerning or RELATED TO CONNECTU, FACEBOOK, and/or FACEBOOK,  
4      Mark Zuckerberg, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss,  
5      David Gucwa, Pacific Northwest Software, www.pickatime.com, Victor Gao, Sanjay Mavinkurve,  
6      Joseph Jackson, Winston Williams, iMarc LLC, Marc Pierrat, Nils Menton, David Tufts, Fred  
7      LeBlanc, Nick Grant, John Taves, Joel Voss, Alex Novikov, Alex Shkuropat,  
8      “PICKATIME\mrprimate,” “PICKATIME\mhayer,” “PICKATIME\jvoss,” “PICKATIME\jt,”  
9      and/or “PICKATIME\ ashkuropat.:”

10     **RESPONSE TO REQUEST NO. 61:**

11     Responding party incorporates the general objections and the objections to definitions into  
12    this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
13    limited to the allegations contained in the Second Amended Complaint. The phrase “concerning or  
14    RELATED TO CONNECTU, FACEBOOK, Mark Zuckerberg, Cameron Winklevoss, Tyler  
15    Winklevoss, Divya Narendra, Howard Winklevoss, David Gucwa, www.pickatime.com, Victor Gao,  
16    Sanjay Mavinkurve, Joseph Jackson, Winston Williams, iMarc LLC, Marc Pierrat, Nils Menton,  
17    Dave Tufts, Fred LeBlanc, Nick Grant, John Taves, Joel Voss, Alex Novikov, Alex Shkuropat,  
18    “PICKATIME\mrprimate,” “PICKATIME\mhayner,” “PICKATIME\jvoss,” “PICKATIME\jt,”  
19    and/or “PICKATIME\ashkuropat.” is obtuse in that it concerns files or documents irrelevant to the  
20    allegations in the Second Amended Complaint and not likely to lead to the discovery of admissible  
21    evidence. The Request further calls for proprietary information. The search for and production of  
22    such documents and files would be overly burdensome and prohibitively expensive.

23     **REQUEST NO. 62:**

24     All COMMUNICATIONS or DOCUMENTS concerning any complaints from users of the  
25    FACEBOOK website concerning the receipt of emails, SPAM, solicitations, or invitations to join the  
26    CONNECTU website.

27     **RESPONSE TO REQUEST NO. 62:**

1        Responding party incorporates the general objections and the objections to definitions into  
2 this response. The search for and production of such documents and files would be overly  
3 burdensome and prohibitively expensive.

4 **REQUEST NO. 63:**

5        All COMMUNICATIONS or DOCUMENTS concerning any complaints from users of any  
6 website, college, business, or social network concerning the receipt of emails, SPAM, solicitations,  
7 or invitations to join the CONNECTU website, including complaints from (but not limited to) users  
8 of the websites www.myspace.com, www.friendster.com, or www.hi5.com.

9 **RESPONSE TO REQUEST NO. 63:**

10      Responding party incorporates the general objections and the objections to definitions into  
11 this response. In addition, Responding party objects to this Request as overbroad, in that it is not  
12 limited to the allegations contained in the Second Amended Complaint. The search for and  
13 production of such documents and files would be overly burdensome and prohibitively expensive.

14 **REQUEST NO. 64:**

15      All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
16 or RELATED TO the “ConnectU Profile Importer” referenced on the attached “Social Butterfly”  
17 document with the Bates-number PNS02096.

18 **RESPONSE TO REQUEST NO. 64:**

19      Responding party incorporates the general objections and the objections to definitions into  
20 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
21 calling for proprietary information. This Request, as phrased calls for the production of documents  
22 and code that are already in Plaintiffs’ possession. The production of code and well as related  
23 documents and files would be overly burdensome, and prohibitively expensive.

24 **REQUEST NO. 65:**

25      All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
26 or RELATED TO the “Profile Grabber” referenced on the attached “Social Butterfly” document  
27 with the Bates-number PNS02096.

1      **RESPONSE TO REQUEST NO. 65:**

2      Responding party incorporates the general objections and the objections to definitions into  
3      this response. In addition, Responding party objects to this Request as overbroad and vague, and  
4      calling for proprietary information. This Request, as phrased calls for the production of documents  
5      and code that are already in Plaintiffs' possession. The production of code and well as related  
6      documents and files would be overly burdensome, and prohibitively expensive.

7      **REQUEST NO. 66:**

8      All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
9      or RELATED TO the "Prox(ies)" referenced on the attached "Social Butterfly" document with the  
10     bates-number PNS02096.

11     **RESPONSE TO REQUEST NO. 66:**

12     Responding party incorporates the general objections and the objections to definitions into  
13     this response. In addition, Responding party objects to this Request as overbroad and vague, and  
14     calling for proprietary information. This Request, as phrased calls for the production of documents  
15     and code that are already in Plaintiffs' possession. The production of code and well as related  
16     documents and files would be overly burdensome, and prohibitively expensive.

17     **REQUEST NO. 67:**

18     All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
19     or RELATED TO the "Crawler" referenced on the attached "Social Butterfly" document with the  
20     bates-number PNS02096.

21     **RESPONSE TO REQUEST NO. 67:**

22     Responding party incorporates the general objections and the objections to definitions into  
23     this response. In addition, Responding party objects to this Request as overbroad and vague, and  
24     calling for proprietary information. This Request, as phrased calls for the production of documents  
25     and code that are already in Plaintiffs' possession. The production of code and well as related  
26     documents and files would be overly burdensome, and prohibitively expensive.

1      **REQUEST NO. 68:**

2            All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
3 or RELATED TO the “Friends List” referenced on the attached “Social Butterfly” document with  
4 the bates-number PNS02096.

5      **RESPONSE TO REQUEST NO. 68:**

6            Responding party incorporates the general objections and the objections to definitions into  
7 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
8 calling for proprietary information. This Request, as phrased calls for the production of documents  
9 and code that are already in Plaintiffs’ possession. The production of code and well as related  
10 documents and files would be overly burdensome, and prohibitively expensive.

11     **REQUEST NO. 69:**

12           All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
13 or RELATED TO the “Cache” referenced on the attached “Social Butterfly” document with the  
14 bates-number PNS02096.

15     **RESPONSE TO REQUEST NO. 69:**

16           Responding party incorporates the general objections and the objections to definitions into  
17 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
18 calling for proprietary information. This Request, as phrased calls for the production of documents  
19 and code that are already in Plaintiffs’ possession. The production of code and well as related  
20 documents and files would be overly burdensome, and prohibitively expensive.

21     **REQUEST NO. 70:**

22           All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
23 or RELATED TO the “Email Queue” referenced on the attached “Social Butterfly” document with  
24 the bates-number PNS02096.

25     **RESPONSE TO REQUEST NO. 70:**

26           Responding party incorporates the general objections and the objections to definitions into  
27 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
28 calling for proprietary information. This Request, as phrased calls for the production of documents

1 and code that are already in Plaintiffs' possession. The production of code and well as related  
2 documents and files would be overly burdensome, and prohibitively expensive.

3 **REQUEST NO. 71:**

4 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
5 or RELATED TO the "Friend Request" referenced on the attached "Social Butterfly" document with  
6 the bates-number PNS02096.

7 **RESPONSE TO REQUEST NO. 71:**

8 Responding party incorporates the general objections and the objections to definitions into  
9 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
10 calling for proprietary information. This Request, as phrased calls for the production of documents  
11 and code that are already in Plaintiffs' possession. The production of code and well as related  
12 documents and files would be overly burdensome, and prohibitively expensive.

13 **REQUEST NO. 72:**

14 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
15 or RELATED TO all statements and statistics contained in YOUR attached May 10, 2005 email  
16 (CUCA02972).

17 **RESPONSE TO REQUEST NO. 72:**

18 Responding party incorporates the general objections and the objections to definitions into  
19 this response. In addition, Responding party objects to this Request as overbroad and vague, and  
20 calling for proprietary information. This Request, as phrased calls for the production of documents  
21 and code that are already in Plaintiffs' possession. The production of code and well as related  
22 documents and files would be overly burdensome, and prohibitively expensive.

23 **REQUEST NO. 73:**

24 All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE, concerning  
25 or RELATED TO how the statistics contained in your attached May 10, 2005 email (CUCA02972)  
26 were calculated.

27

28

1      **RESPONSE TO REQUEST NO. 73:**

2      Responding party incorporates the general objections and the objections to definitions into  
3      this response. In addition, Responding party objects to this Request as overbroad and vague, and  
4      calling for proprietary information. This Request, as phrased calls for the production of documents  
5      and code that are already in Plaintiffs' possession. The production of code and well as related  
6      documents and files would be overly burdensome, and prohibitively expensive.

7      **REQUEST NO. 74:**

8      All COMMUNICATIONS or DOCUMENTS, including all COMPUTER CODE,  
9      concerning or RELATED TO the sources of all information contained in YOUR attached May 10,  
10     2005 email (CUCA02972), including all database information used to generate the information.

11     **RESPONSE TO REQUEST NO. 74:**

12     Responding party incorporates the general objections and the objections to definitions into  
13     this response. In addition, Responding party objects to this Request as overbroad and vague, and  
14     calling for proprietary information. This Request, as phrased calls for the production of documents  
15     and code that are already in Plaintiffs' possession. The production of code and well as related  
16     documents and files would be overly burdensome, and prohibitively expensive.

17     **REQUEST NO. 75:**

18     All DOCUMENTS, contracts, insurance policies, indemnity agreements, or similar  
19     agreements associated with YOUR work on behalf of CONNECTU, Pacific Northwest Software,  
20     www.pickatime.com, i2hub, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard  
21     Winklevoss, Wayne Chang, David Gucwa, Winklevoss Consultants, and/or RowAmerica LLC, to  
22     the extent YOU contend such DOCUMENT, contract, insurance policy, indemnity agreement, or  
23     similar agreement obligates CONNECTU, www.pickatime.com, i2hub, Cameron Winklevoss, Tyler  
24     Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Gucwa, Winklevoss  
25     Consultants, and/or RowAmerica LLC to pay all or part of any portions of damages, costs, or  
26     attorneys fees in any of the LAWSUITS.

1     **RESPONSE TO REQUEST NO. 75:**

2         Responding party incorporates the general objections and the objections to definitions into  
3         this response. In addition, Responding party objects to this Request as overbroad in that it is not  
4         limited to the allegations contained in the Second Amended Complaint. This Request also seeks  
5         documents and information in violation of the Attorney-client privilege. To the extent documents  
6         exist that are responsive to this Request, it seeks irrelevant information not calculated to lead to the  
7         discovery of admissible evidence.

8     **REQUEST NO. 76:**

9         All DOCUMENTS reflecting the value of any services YOU rendered on behalf of any of  
10         CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub, Cameron Winklevoss, Tyler  
11         Winklevoss, Divya Narendra, Howard Winklevoss, Wayne Chang, David Gucwa, Winklevoss  
12         Consultants, and/or RowAmerica LLC.

13     **RESPONSE TO REQUEST NO. 76:**

14         Responding party incorporates the general objections and the objections to definitions into  
15         this response. In addition, this Request is unintelligible regarding the phrase "documents reflecting  
16         the value of any services YOU rendered on behalf of any of CONNECTU, www.pickatime.com,  
17         i2hub, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Wayne  
18         Chang, David Gucwa, Winklevoss Consultants, and/or RowAmerica LLC."

19     **REQUEST NO. 77:**

20         All DOCUMENTS reflecting any agreement or contract for YOU to perform services on  
21         behalf of any of CONNECTU, Pacific Northwest Software, www.pickatime.com, i2hub, Cameron  
22         Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, David Gucwa, Winklevoss  
23         Consultants, and/or RowAmerica LLC.

24     **RESPONSE TO REQUEST NO. 77:**

25         Responding party incorporates the general objections and the objections to definitions into  
26         this response. This Request is overbroad in that it calls for documents that are unrelated to the  
27         allegations in the Second Amended Complaint and not calculated to lead to the discovery of

1 admissible evidence. The Request further calls for proprietary information. The search for and  
2 production of such documents and files would be overly burdensome and prohibitively expensive.

3 **REQUEST NO. 78:**

4 All DOCUMENTS reflecting the dates and number of invitations sent by CONNECTU to  
5 users of FACEBOOK to join the CONNECTU website.

6 **RESPONSE TO REQUEST NO. 78:**

7 Responding party incorporates the general objections and the objections to definitions into this  
8 response. The search for and production of such documents and files would be overly burdensome  
9 and prohibitively expensive.

10 **REQUEST NO. 79:**

11 All DOCUMENTS reflecting any actual or attempted transfer, migration or integration of  
12 databases or COMPUTER CODE available at Pacific Northwest Software, iMarc,  
13 www.pickatime.com, stallscribbles.com, and/or i2hub.com with or to any server or computer  
14 maintained for or on behalf of CONNECTU.

15 **RESPONSE TO REQUEST NO. 79:**

16 Responding party incorporates the general objections and the objections to definitions into  
17 this response. This Request is overly broad in that it calls for documents unrelated to the allegations  
18 in the Second Amended Complaint and not calculated to lead to the discovery of admissible  
19 evidence. The Request further calls for proprietary information. The search for and production of  
20 such documents and files would be overly burdensome and prohibitively expensive.

21 **REQUEST NO. 80:**

22 All DOCUMENTS reflecting YOUR dates of employment at or consulting for Pacific  
23 Northwest Software.

24 **RESPONSE TO REQUEST NO. 80:**

25 Responding party incorporates the general objections and the objections to definitions into  
26 this response. This request is overly burdensome. It calls for documents that are irrelevant and not  
27 calculated to lead to the discovery of admissible evidence.

1   **REQUEST NO. 81:**

2           All DOCUMENTS reflecting YOUR dates of employment at or consulting for CONNECTU.

3   **RESPONSE TO REQUEST NO. 81:**

4           Responding party incorporates the general objections and the objections to definitions into  
5   this response. This request is overly burdensome. It calls for documents that are irrelevant and not  
6   calculated to lead to the discovery of admissible evidence. This request further calls for confidential  
7   information.

8   **REQUEST NO. 82:**

9           All DOCUMENTS reflecting YOUR dates of employment at or consulting for any entity  
10   bearing the name "Winklevoss" in its title, or associated with Howard Winklevoss.

11   **RESPONSE TO REQUEST NO. 82:**

12           Responding party incorporates the general objections and the objections to definitions into  
13   this response. This request is overly burdensome. It calls for documents that are irrelevant and not  
14   calculated to lead to the discovery of admissible evidence. This request further calls for confidential  
15   information.

16   **REQUEST NO. 83:**

17           All DOCUMENTS OR COMMUNICATIONS concerning this litigation to the extent such  
18   DOCUMENTS or COMMUNICATIONS do not evidence communications between YOU and  
19   YOUR litigation counsel after they began to represent YOU.

20   **RESPONSE TO REQUEST NO. 83:**

21           Responding party incorporates the general objections and the objections to definitions into  
22   this response. In addition, this Request is overly broad in that it would call for the search and  
23   production of any document with the words, "ConnectU or Facebook" or other similar words. The  
24   search for and production of such documents and files would be overly burdensome and  
25   prohibitively expensive.

26   **REQUEST NO. 84:**

27           All DOCUMENTS reflecting any investment, or proposed investment, by YOU in  
28   CONNECTU.

1     **RESPONSE TO REQUEST NO. 84:**

2                 Responding party incorporates the general objections and the objections to definitions into  
3     this response. In addition, this Request is unintelligible regarding the phrase “investment or  
4     proposed investment” in ConnectU. Further this Request as overbroad in that it is not limited to the  
5     allegations contained in the Second Amended Complaint.

6     **REQUEST NO. 85:**

7                 All DOCUMENTS reflecting any investment, or proposed investment, in CONNECTU by  
8     PERSONS other than YOU.

9     **RESPONSE TO REQUEST NO. 85:**

10                Responding party incorporates the general objections and the objections to definitions into  
11     this response. In addition, this Request is unintelligible regarding the phrase “investment or  
12     proposed investment” in ConnectU. Further this Request as overbroad in that it is not limited to the  
13     allegations contained in the Second Amended Complaint.

14     **REQUEST NO. 86:**

15                All DOCUMENTS reflecting any effort(s) or attempt(s) by YOU to promote or market the  
16     CONNECTU website.

17     **RESPONSE TO REQUEST NO. 86:**

18                Responding party incorporates the general objections and the objections to definitions into  
19     this response. In addition, this Request is unintelligible regarding the phrase “effort or attempt to  
20     promote or market the ConnectU website.” This Request calls for documents that are irrelevant to  
21     the allegations in the Second Amended Complaint and not calculated to lead to the discovery of  
22     admissible evidence. The search for and production of such documents and files would be overly  
23     burdensome and prohibitively expensive.

24     **REQUEST NO. 87:**

25                All DOCUMENTS reflecting any effort(s) or attempt(s) by CONNECTU, Cameron  
26     Winklevoss, Tyler Winklevoss, Divya Narendra, Howard Winklevoss, Winklevoss Consultants,  
27     RowAmerica LLC, Victor Gao, Sanjay Mavinkurve, Joseph Jackson, David Gucwa, Joel Voss, John  
28     Taves, Wayne Chang, and/or iMarc to promote or market the CONNECTU website.

RESPONSES OF DEFENDANT WINSTON WILLIAMS TO

PLAINTIFFS' FIRST REQUEST FOR

PRODUCTION OF DOCUMENTS (NOS. 1-99)

Case No. 5:07 CV 01389 RS

1     **RESPONSE TO REQUEST NO. 87:**

2         Responding party incorporates the general objections and the objections to definitions into  
3         this response. In addition, this Request is unintelligible regarding the phrase “promote or market the  
4         ConnectU website.” This Request calls for documents that are irrelevant to the allegations in the  
5         Second Amended Complaint and not calculated to lead to the discovery of admissible evidence. The  
6         search for and production of such documents and files would be overly burdensome and  
7         prohibitively expensive.

8     **REQUEST NO. 88:**

9         All DOCUMENTS reflecting any effort(s) or attempt(s) by Pacific Northwest Software or  
10         www.pickatime.com to promote or market the CONNECTU website.

11     **RESPONSE TO REQUEST NO. 88:**

12         Responding party incorporates the general objections and the objections to definitions into  
13         this response. In addition, this Request is unintelligible regarding the phrase “promote or market the  
14         ConnectU website”. This Request calls for documents that are irrelevant to the allegations in the  
15         Second Amended Complaint and not calculated to lead to the discovery of admissible evidence. The  
16         search for and production of such documents and files would be overly burdensome and  
17         prohibitively expensive.

18     **REQUEST NO. 89:**

19         An electronic image of the entire computer hard drive(s) or other computer memory devices  
20         controlled and used by YOU or any of YOUR agents, employees, assignees or consultants, to the  
21         extent that computer was used to communicate regarding or reflects the creation or development of  
22         the COMPUTER CODE, or any software reflecting the creation, development and operation of the  
23         ConnectU website, the Social Butterfly program, or the Facebook Importer program.

24     **RESPONSE TO REQUEST NO. 89:**

25         Responding party incorporates the general objections and the objections to definitions into  
26         this response. In addition, this Request substantially overbroad. This Request calls for the  
27         production of files and other information that is confidential. This Request calls for the production  
28         of files and other information that is irrelevant and not calculated to lead to the discovery of

1 admissible evidence. The search for and production of such documents and files, including an  
2 electric image of all identified computer hard drives would be overly burdensome and prohibitively  
3 expensive.

4 **REQUEST NO. 90:**

5 All DOCUMENTS reflecting the date(s) of operation and execution of any computer  
6 program, source code or script designed to obtain for CONNECTU email addresses, profile  
7 information, course information, images, or other data from the FACEBOOK website(s).

8 **RESPONSE TO REQUEST NO. 90:**

9 Responding party incorporates the general objections and the objections to definitions into  
10 this response. This request is vague as to the phrase "reflecting the date(s) of operation and  
11 execution of." This Request is overly burdensome.

12 **REQUEST NO. 91:**

13 All DOCUMENTS reflecting, associated with, or RELATING TO any of YOUR responses  
14 to Interrogatories in this action.

15 **RESPONSE TO REQUEST NO. 91:**

16 Responding party incorporates the general objections and the objections to definitions into  
17 this response. This Request is overly broad. The search for and production of such documents and  
18 files would be overly burdensome and prohibitively expensive.

19 **REQUEST NO. 92:**

20 All DOCUMENTS reflecting, associated with, or RELATING TO the dates of operation of  
21 the programs known as "Social Butterfly," "importer," "Facebook Importer," "grabFacebook.php,"  
22 "grabFacebook.2php," "social network spider" or "crawler."

23 **RESPONSE TO REQUEST NO. 92:**

24 Responding party incorporates the general objections and the objections to definitions into  
25 this response. In addition, this Request is unintelligible regarding the phrase "programs known as  
26 ..." The search for and production of such documents and files would be overly burdensome and  
27 prohibitively expensive.

1      **REQUEST NO. 93:**

2            All DOCUMENTS reflecting, associated with, or RELATED TO the deletion or overwriting  
3       by YOU, CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa, Wayne Chang,  
4       Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard Winklevoss, of any  
5       information (including database information) concerning the identities of FACEBOOK users whose  
6       email addresses or profile information originally was obtained as a result of the operation of the  
7       programs known as “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,”  
8       “grabFacebook2.php,” “social network spider” or “crawler.”

9      **RESPONSE TO REQUEST NO. 93:**

10           Responding party incorporates the general objections and the objections to definitions into  
11       this response. In addition, this Request is unintelligible regarding the phrase “programs known as  
12       “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,” “grabFacebook2.php,”  
13       “social network spider” or “crawler”. Responding party objects to this Request as irrelevant and not  
14       calculated to lead to the discovery of admissible evidence. The search for and production of such  
15       documents and files would be overly burdensome and prohibitively expensive.

16      **REQUEST NO. 94:**

17           All DOCUMENTS reflecting, associated with or RELATED TO instructions by  
18       CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa, Wayne Chang, Cameron  
19       Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard Winklevoss to cease operation of  
20       the programs known as “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,”  
21       “grabFacebook2.php,” “social network spider” or “crawler.”

22      **RESPONSE TO REQUEST NO. 94:**

23           Responding party incorporates the general objections and the objections to definitions into  
24       this response. In addition, this Request is unintelligible regarding the phrase “programs known as  
25       “Social Butterfly,” “importer,” “Facebook Importer,” “grabFacebook.php,” “grabFacebook2.php,”  
26       “social network spider” or “crawler”. Responding party objects to this Request as irrelevant and not  
27       calculated to lead to the discovery of admissible evidence. The search for and production of such  
28       documents and files would be overly burdensome and prohibitively expensive.

1     **REQUEST NO. 95:**

2                 All DOCUMENTS reflecting, associated with or RELATED TO any FACEBOOK ID table  
3 created to store the identities of Facebook users whose profile or other information were imported by  
4 YOU, CONNECTU, Pacific Northwest Software, www.pickatime, David Gucwa, Wayne Chang,  
5 Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or Howard Winklevoss.

6     **RESPONSE TO REQUEST NO. 95:**

7                 Responding party incorporates the general objections and the objections to definitions into  
8 this response. In addition, this Request is unintelligible regarding the phrase “RELATED TO any  
9 FACEBOOK ID table”. Responding party objects to this Request as overbroad in that it is not  
10 limited to the allegations contained in the Second Amended Complaint. The search for and  
11 production of such documents and files would be overly burdensome and prohibitively expensive.

12     **REQUEST NO. 96:**

13                 All DOCUMENTS reflecting, associated with or RELATED TO any table called or referred  
14 to as “facebook\_id table” by YOU, CONNECTU, Pacific Northwest Software, www.pickatime,  
15 David Gucwa, Wayne Chang, Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, and/or  
16 Howard Winklevoss.

17     **RESPONSE TO REQUEST NO. 96:**

18                 Responding party incorporates the general objections and the objections to definitions into  
19 this response. In addition, this Request is unintelligible regarding the phrase “facebook\_id table”.  
20 Responding party objects to this Request as overbroad in that it is not limited to the allegations  
21 contained in the Second Amended Complaint. The search for and production of such documents and  
22 files would be overly burdensome and prohibitively expensive.

23     **REQUEST NO. 97:**

24                 One executable copy of each version of COMPUTER CODE developed by YOU,  
25 CONNECTU, Pacific Northwest Software, Howard Winklevoss, Winklevoss Consultants,  
26 Winklevoss, Inc., Cameron Winklevoss, Tyler Winklevoss, Divya Narendra, Wayne Chang, Joel  
27 Voss, Mike Hayner, John Taves, and/or David Gucwa, which COMPUTER CODE contains the  
28

1 programs known as "Social Butterfly," "importer," "Facebook Importer," "grabfacebook.php,"  
2 "grabFacegook2.php," "social network spider" or "crawler."

3 **RESPONSE TO REQUEST NO. 97:**

4 Responding party incorporates the general objections and the objections to definitions into  
5 this response. In addition, this Request is unintelligible regarding the phrase "programs known as  
6 "Social Butterfly," "importer," "Facebook Importer," "grabFacebook.php," "grabFacebook2.php,"  
7 "social network spider" or "crawler". Responding party objects to this Request as irrelevant and not  
8 calculated to lead to the discovery of admissible evidence. This Request, as phrased calls for the  
9 production of all code, regardless of whether it is relevant to the allegations against Responding  
10 party in the Second Amended Complaint. Moreover, Responding party objects to this Request as  
11 duplicative to the extent that Requesting party already has relevant code in its possessions. This  
12 Request is overly burdensome, and literal compliance with it would be prohibitively expensive.

13 **REQUEST NO. 98:**

14 All DOCUMENTS regarding services, including hosting services, provided to YOU by Pick-  
15 A-Time.

16 **RESPONSE TO REQUEST NO. 98:**

17 Responding party incorporates the general objections and the objections to definitions into  
18 this response. The phrase "regarding services, including hosting services, provided to YOU by  
19 Pick-A-Time." is overbroad in that it calls for documents and communications that are irrelevant to  
20 the allegations in the second amended complaint and not calculated to lead to the discovery of  
21 admissible evidence. As such, to perform a search so broad would require an undue amount of time  
22 and expense. This request calls for confidential information.

23 **REQUEST NO. 99:**

24 DOCUMENTS sufficient to identify any web hosting company or data center through which  
25 YOU, Pacific Northwest Software, Pick-a-Time, CONNECTU, or i2Hub stored COMPUTER  
26 CODE.

1     **RESPONSE TO REQUEST NO. 99:**

2         Responding party incorporates the general objections and the objections to definitions into  
3         this response. This Request is substantially overbroad, calling for irrelevant information not  
4         calculated to lead to the discovery of admissible evidence. The Request further calls for proprietary  
5         information. The search for and production of such documents and files would be overly  
6         burdensome and prohibitively expensive.

7             As to objections.

8

9     Dated: December 26, 2007

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

10

11             By: 

12             Scott R. Mosko  
13             Attorneys for Defendant  
14             Winston Williams

1 Scott R. Mosko (State Bar No. 106070)  
2 scott.mosko@finnegan.com  
3 FINNEGAN, HENDERSON, FARABOW,  
4 GARRETT & DUNNER, L.P.  
5 Stanford Research Park  
6 3300 Hillview Avenue  
7 Palo Alto, California 94304  
8 Telephone: (650) 849-6600  
9 Facsimile: (650) 849-6666

10  
11 Attorneys for Defendant  
12 Pacific Northwest Software, Inc., and  
13 Winston Williams

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

FACEBOOK, INC., and MARK ZUCKERMAN,  
Plaintiffs,

CASE NO. 5:07-CV-01389-RS

**CERTIFICATE OF SERVICE**

v.  
CONNECTU LLC, (now known as CONNECTU  
INC.), CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, DIVYA NARENDRA, PACIFIC  
NORTHWEST SOFTWARE, INC., WINSTON  
WILLIAMS, WAYNE CHANG, DAVID  
GUCWA AND DOES 1-25,

Defendants.

## CERTIFICATE OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to this action.

3 My place of employment and business address is Finnegan, Henderson, Farabow, Garrett, & Dunner,  
4 L.L.P., 3300 Hillview Avenue, Palo Alto, California 94304. On December 26, 2007, I caused a  
5 copy of the following documents to be served:

- DEFENDANT WINSTON WILLIAMS'S RESPONSES TO PLAINTIFF FACEBOOK INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1-99)
  - DEFENDANT PACIFIC NORTHWEST SOFTWARE, INC'S RESPONSES TO PLAINTIFF FACEBOOK INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1-96)

on all parties as follows:

*Attorneys for Plaintiff*

Theresa Sutton, Esq.  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
Menlo Park, CA 94025  
Telephone: 650.614.7400  
Facsimile: 650.614.7401

- Via First Class Mail
  - Via Hand Delivery
  - Via Overnight Courier
  - Via Facsimile
  - Via Email

16 I am readily familiar with my firm's practice for collection, processing correspondence, and  
17 sending documents via email in the ordinary course of business. I sent said document on December  
18 26, 2007, consistent with ordinary business practice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on December 26, 2007, at Palo Alto, California.

  
Lissette Vazquez